

THE LINDEN LAW GROUP, P.C.
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Attorneys for all Defendants

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

X

CARMEN YANES, individually on behalf of
herself and all other persons similarly situated,

Civ. Action No: 19-cv-00201 (JS)(ARL)

Plaintiff,

v s .

**DECLARATION TO
WITHDRAW AS COUNSEL**

JUAN & JON INC. d/b/a JUAN AND JON,
and JUAN CARLOS DE LOS SANTOS,

Defendants.

X

DECLARATION IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL

Jeffrey Benjamin, under penalty of perjury, declares as follows:

- 1) I am a partner with the law firm of The Linden Law Group, P.C., counsel for all Defendants in this action.
- 2) I respectfully submit this Declaration in support of my motion to withdraw as counsel of record for all Defendants.
- 3) At this time, my firm and I require termination of our client's representation. The withdrawal request is based on irreconcilable differences and business reasons. Without divulging client confidences with their counsel, there has been a chronic lack of communication and cooperation with the undersigned counsel after multiple efforts over months.
- 4) This case is on for trial on October 3, 2022.

- 5) Under these circumstances, Defendants have made it impossible to properly defend them in this case, namely trial.
- 6) As such, defense counsel respectfully requests that I and my firm be relieved as counsel for all Defendants, and that the Court allow Defendants thirty (30) days or more to find new counsel or proceed *pro se*.

Dated: September 21, 2022
New York, New York

THE LINDEN LAW GROUP, P.C.

Jeffrey Benjamin

By: Jeffrey Benjamin, Esq.
Attorneys for All Defendants
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